

LAW OFFICE OF
ZACHARY MARGULIS-OHNUMA

March 5, 2020


MEMO ENDORSED

Via ECF

Hon. Kenneth M. Karas
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, NY 10601

RE: U.S. v. Alexander Finley, 19 Cr. 330 (KMK)

Dear Judge Karas:

This office represents the defendant Alexander Finley in the above-captioned case. The case is scheduled for a status conference next Tuesday, March 10, 2020. I write to request the conference be adjourned for approximately three weeks. This is the first request for an adjournment of this conference. The government consents to this request. 

As the Court is aware, the parties are engaged in plea negotiations which both sides anticipate will result in a disposition of the charges. A draft plea offer was forwarded to me yesterday evening but, unfortunately, due to logistical constraints, I will not be able to convey or review the offer with Mr. Finley prior to Tuesday's scheduled conference. Accordingly, in order to assure that Mr. Finley is ready to go forward with a guilty plea at the next conference, I request that the date be adjourned for at least two weeks.

I have conferred with AUSA Christopher Brumwell he advises that the government consents to the adjournment request. Mr. Finley hereby consents to an exclusion of speedy trial time until the next court date. After reviewing my own schedule and discussing dates with Mr. Brumwell, it appears that the earliest dates in that timeframe that both parties are available to appear are March 31 or April 3, 2020. We request that the conference be schedule for one of those days or a date later in April.

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Thank you for your attention to this case.

Very truly yours,

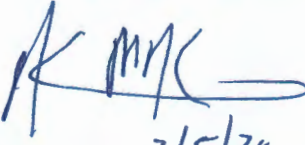
Zachary Margulis-Ohnuma

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CC: AUSA Christopher Brumwell (via ECF and email)

Granted.

*The conference is adjourned to April 3,
2020, at 11:00. Time is excluded
until then, in the interests of justice,
See 18 U.S.C. § 3161(h)(7)(A).*

So Ordered-

3/5/20